

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

FILED
CLERK'S OFFICE
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STEVEN R. KINCAID,

Plaintiff,

vs.

BANK OF AMERICA,

Defendant.

04-CV-11522 (WGY)

**CERTIFICATION OF DEBORAH MARTIN NORCROSS IN SUPPORT OF MOTION
UNDER LOCAL RULE 83.5.3 FOR ADMISSION PRO HAC VICE**

DEBORAH MARTIN NORCROSS, BEING DULY SWORN, DEPOSES AND
SAYS:

1. I have personal knowledge of the facts recited within this affidavit and am competent in all respects to make these representations.

1. I am fully familiar with the facts and circumstances concerning the above-captioned litigation and submit this affidavit in support of my application for admission *pro hac vice* before this Court.

2. I graduated from Rutgers School of Law – Newark in May 1981 and am the sole member of the firm LAW OFFICES OF DEBORAH MARTIN NORCROSS LLC.

3. I was admitted to the Bar of the State of New Jersey in 1981. My certificate of good standing is attached as Exhibit 1. I am also admitted to practice in New York and

Pennsylvania (inactive); in the United States Supreme Court; in the United States Courts of Appeals for the Second, Third, and Fourth Circuits; and in the United States District Courts for the Northern, Eastern, and Southern Districts of New York, the District of New Jersey, and the Eastern District of Pennsylvania.

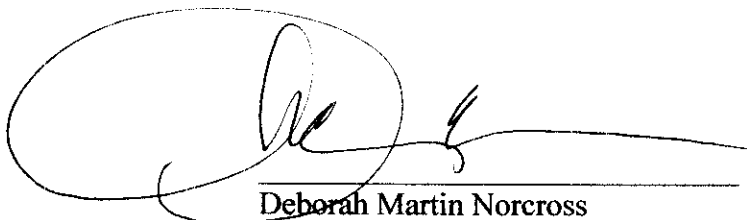
4. I am a member in good standing of the Bar of every court in which I have been admitted to practice. No disciplinary proceedings are pending against me in any jurisdiction. No disciplinary proceedings have previously been imposed against me in any jurisdiction.

5. My client in this matter, Steven Kincaid, has requested that I participate, together with John B. Harkavy, Esq. of the firm BERNKOPF, GOODMAN LLP, a member of the Massachusetts Bar, in the litigation of this proceeding. I have specialized in the practice of employment law for my entire twenty-three years of practice and have a well-established relationship with Mr. Kincaid. Accordingly, I respectfully request leave of this Court to appear in this proceeding as co-counsel for Mr. Kincaid *pro hac vice*.

6. In accordance with Local Rule 7.1(a)(2), I personally consulted with George Kostakos of the firm EDWARDS & ANGELL, LLP, counsel for Defendant, who has consented to this application.

7. I am familiar with, and will abide by, the Local Rules of this Court.

I certify that the foregoing statements made by me are true. I am aware that, if any of my foregoing statements are willfully false, I am subject to punishment.

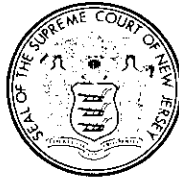


Deborah Martin Norcross

Dated: November 9, 2004
Princeton, New Jersey

EXHIBIT 1

Supreme Court of New Jersey

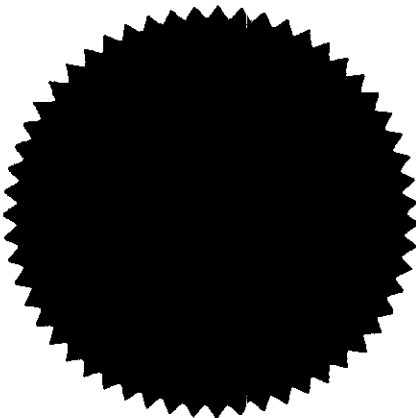


Certificate of Good Standing

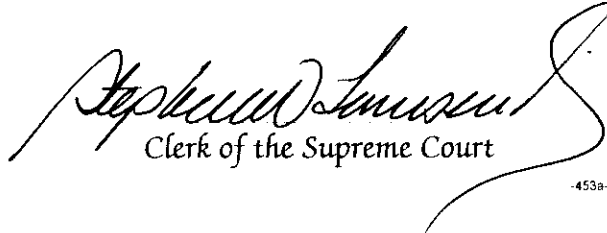
This is to certify that **DEBORAH K MARTIN-NORCROSS**
(No. **024111981**) was constituted and appointed an Attorney at Law of New
Jersey on **December 17, 1981** and, as such,
has been admitted to practice before the Supreme Court and all other courts of this State
as an Attorney at Law, according to its laws, rules, and customs.

I further certify that as of this date, the above-named is an Attorney at Law in
Good Standing. For the purpose of this Certificate, an attorney is in "Good Standing"
if the Court's records reflect that the attorney: 1) is current with all assessments
imposed as a part of the filing of the annual Attorney Registration Statement, including,
but not limited to, all obligations to the New Jersey Lawyers' Fund for Client
Protection; 2) is not suspended or disbarred from the practice of law; 3) has not
resigned from the Bar of this State; and 4) has not been transferred to Disability
Inactive status pursuant to Rule 1:20-12.

*Please note that this Certificate does not constitute confirmation of an attorney's
satisfaction of the administrative requirements of Rule 1:21-1(a) for eligibility to
practice law in this State.*



In testimony whereof, I have
hereunto set my hand and
affixed the Seal of the
Supreme Court, at Trenton, this
8TH day of November, 20⁰⁴


Clerk of the Supreme Court

CERTIFICATE OF SERVICE

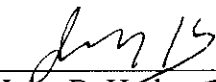
I, John B. Harkavy, do hereby certify that I caused to be served this 12th day of November 2004, the Motion for Admission Pro Hac Vice of Deborah Martin Norcross via first class mail upon the following:

Melanie L. Glickson

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John B. Harkavy